

REQUEST FOR COMMENTS

6/81
R3E942P

PERMITS SECTION

DATE 5-21-82

FROM G. M'ARTHUR

PERMIT APPLICATION NO. C

PERMIT EXEMPTION NO. X-3611

☐ CONFIDENTIAL INFORMATION ATTACHED.

TO: ☒ REGION: (8) ☒ CITY; ☐ COUNTY;

☐ AR&A; ☒ COMPLIANCE; ☒ LEGAL

Applicant indicates copy of application was sent direct to:

☐ Region ☐ City ☐ County

1. COMPANY: CONSOLIDATED CASTINGS CORP.
2. FACILITY LOCATION: 2425 CAROLINE, DALLAS
3. LATITUDE: 32°-47'-23" LONGITUDE: 96°-48'-25" COMPANY I.D. NO: _____
4. PERMIT UNIT NAME: MOLD HEATING FURNACES (3) UNIT I.D.: _____
5. PREVIOUS RELATED PERMITS/EXEMPTIONS: C-2864 C-3085

6. ☒ - NEW SOURCE ☐ - MODIFICATION ☐ - NSPS ☐ - NESILAPS ☐ - PORTABLE ☐ - PSD
☐ - PERMIT AMENDMENT ☐ - PERMIT REVISION OR CHANGE

DATE: _____ for ☐ - PROPOSED START OF CONSTRUCTION. ☐ - CONSTRUCTION STARTED.
☒ - FACILITY BUILT AND OPERATING ☐ - AS SOON AS PERMIT IS ISSUED.

7. NAME AND RATE OF AIR CONTAMINANTS: OPER SCHED: 16 H/D; 5 D/W; 51 W/Y; _____ CONTINUOUS

Air Contaminant	Permit Max. Allow. Rate	M*	Actual Rate	Previous Rate	Comments:
<u>PART.</u>	<u>NIL</u>				

RECEIVED

MAY 26 1982

M* - Method of Calculation or source of information for Permit Maximum Allowable Rate -

EF - Emission Factors; AD - Application Data; SP - Similar Permit Data;

EPA - EPA Documents; EST - Estimate; TD - Test Data or other;

() Explain

REGION 8

TEXAS AIR CONTROL BOARD

8. METHOD OF AIR POLLUTION CONTROL: ☐ - NONE ☐ - BACT (Standard) ☐ - BACT (transferred)
☐ - PROCESS CONTROL ☒ ABATEMENT EQUIPMENT: AFTERBURNER ON EACH FURNACE

9. ENGR. COMMENTS/TECHNICAL REVIEW/RECOMMENDATION: ☐ ISSUE ☒ EXEMPTION ☐ DENY
THERE SHOULD BE VIRTUALLY NO EMISSIONS FROM THIS OPERATION

10. PROPOSED SPECIAL PROVISIONS (Other than General Provisions and Maximum Allowables): _____

REQUESTED COMMENTS: (Please return your comments promptly.) ☐ RUSH

SITE OR LOCATION:

- ☐ SATISFACTORY
☐ QUESTIONABLE
☐ UNSATISFACTORY

☐ SEE SIS DATED _____

☐ NO OBJECTIONS.

☐ COMMENTS _____

9490351



ACCOUNT NUMBER DB-0201-M
1 7
Date of Investigation 05 / 12 / 82
8 10 12

TEXAS AIR CONTROL BOARD
SOURCE INVESTIGATION SYSTEM

Form No. SIS-5

PERMANENT SOURCE INFORMATION

01 Action Code ☐ County Dallas Jurisdiction 082 Source Status: AA ☒ EX ☐ DA ☐
16 17 30 33 34 35
Company Name, Location, Mailing Address Facility Type Enter Y or N in each box
02 Consolidated Castings Corp * Portable Unit ☐ Significant Pollutants
16 53 54
03 2425 Caroline, Dallas Federal Facility ☐ PA ☐
16 53 34 55
04 _____ NSPS ☐ SO₂ ☐
16 53 54 55
05 _____ NESHAPS ☐ HC ☐
16 53 54 55
06 _____ EPA Major Source ☐ CO ☐
16 53 54 55
07 _____ EPA Minor Source ☐ NO_x ☐
16 53 54 55
08 _____ Other ☐ Other ☐
16 53 54 65 67 69
09 Group ☐ Business/Products ☐
16 18 20 22 80

10 INVESTIGATIONS: Agency Comment ☐ Alternate Method ☐ Burning ☐ Permit ☒ X-3611 ☐
16 17 18 19 20 (Permit No.) 27
Complaint ☐ NSPS ☐ NESHAPS ☐ Observed Sample ☐ Progress Report ☐ Order ☐
28 29 30 31 32 33
Sampling ☐ Rule 7 & 8 ☐ SIP ☐ Source Surveillance ☐ Other ☐
34 35 36 37 38 60
11 Investigator Codes 000 Technical Report ☐ Source ☐
16 19 22 25 26 29 32 35 38 41 44 47
12 Management Joe Duran Title Maint. Mgr Phone (214) 748-9051
16 40 41 60 51 64 67
13 Person Contacted Sara Title _____ Phone () _____
16 40 41 60 61 64 67

14 Complaint No. ☐ Date Received ☐ / ☐ / ☐ Odor ☐ Smoke ☐ Dust ☐ Other ☐
16 22 26 28 30 32 33 34 35 46
15 Complaint No. ☐ Date Received ☐ / ☐ / ☐ Odor ☐ Smoke ☐ Dust ☐ Other ☐
16 22 26 28 30 32 33 34 35 46
Findings: Confirmed ☐ Unconfirmed ☐ Odor ☐ Smoke ☐ Dust ☐ Other ☐ Cause ☐

REPRESENTATIVE SAMPLES

ATION DATA

May 12, 1982

Dallas County Page 2
Consolidated Castings Corp

Investigator's Findings:

An investigation was conducted this date to review the proposed installation of three mold heat treating furnaces at the subject precision steel casting operation. It was found that the three furnaces are already installed. Two are fully operational while the third is nearly so. The City of Dallas APC Section has issued a Notice of Violation of Regulation VI, Rule 116.1.

The process consists of the lost wax method for producing precision castings for machine parts primarily for the petroleum industry. Paraffin base wax items are prepared in one operation and placed onto a "tree" (multiple units, sometimes several hundred to a tree). The "trees" are then coated with a series of soaks in a colloidal sand and water mixture. When hardened the items are placed in a steam heated autoclave where the wax melts out and is captured for recycling. A residual wax film is still left in the molds at this stage. The subject furnaces are used to progressively heat up the sand molds to a ceramic-like state during which the remaining wax is burned out. While the molds are still red hot, molten alloy steel prepared in two electric induction furnaces is ladled into the molds. The remainder of the operation consists of a manual breaking of the molds, deburring, and some machining and heat treating. There are no controls on any of the operations except for 907,000 BTU afterburners on each stack of the subject mold heating furnaces.

As stated, two of the furnaces were operational and no visible emissions were noted from the stacks.

The facility does have a history of visible emission problems associated with the old furnaces. The three subject furnaces replaced three older furnaces which are now being converted to heat treating.

The facility is located within the central business district of Dallas and in this position is surrounded by predominately commercial and warehousing operations.

Recommendation:

Exempt the three replacement mold heat treating furnaces subject to the limitations established in Regulation I, Rule 111.21 (opacity < 20%).



CITY OF DALLAS

May 28, 1982

James C. Myers, P.E., Acting Director
Permits Division
Texas Air Control Board
6330 Highway 290 East
Austin, Texas 78723

Re: Permit No. X-3611
Consolidated Casting Corporation
Mold Heating Furnaces (3)
(G. McArthur, Engineer)

Dear Mr. Myers:

The City of Dallas has reviewed the referenced application.
We concur that these furnaces should be exempted as insignificant sources.

Sincerely,

E. G. Lipnicky
Air Pollution Control Engineer
Air Pollution Control Section

dg

cc: Melvin Lewis, Supervisor, Region 8
Rodger Jayroe

REQUEST FOR COMMENTS

PERMITS SECTION

DATE 5-21-82☐ CONFIDENTIAL INFORMATION ATTACHED.FROM G. MARTHAURTO: ☒ REGION: B ☒ CITY: ☐ COUNTY:☐ AR&A;☒ COMPLIANCE: ☒ LEGALPERMIT APPLICATION NO. C

Applicant indicates copy of application was sent direct to:

PERMIT EXEMPTION NO. X-3611☐ Region☐ City☐ County

1. COMPANY: CONSOLIDATED CASTINGS CORP.
2. FACILITY LOCATION: 2425 CAROLINE, DALLAS
3. LATITUDE: 32° 47' 23" LONGITUDE: 96° 48' 25" COMPANY I.D. NO: _____
4. PERMIT UNIT NAME: MOLD HEATING FURNACES (3) UNIT I.D.: _____
5. PREVIOUS RELATED PERMITS/EXEMPTIONS: C-2864 C-3085
6. ☒ - NEW SOURCE ☐ - MODIFICATION ☐ - NSPS ☐ - NESIAPS ☐ - PORTABLE ☐ - PSD
☐ - PERMIT AMENDMENT ☐ - PERMIT REVISION OR CHANGE
DATE: _____ for ☐ - PROPOSED START OF CONSTRUCTION. ☐ - CONSTRUCTION STARTED.
☒ - FACILITY BUILT AND OPERATING ☐ - AS SOON AS PERMIT IS ISSUED.
7. NAME AND RATE OF AIR CONTAMINANTS: OPER SCHED: 16 H/D; 5 D/W; 51 W/Y; _____ CONTINUOUS

Air Contaminant	Permit Max. Allow. Rate	M*	Actual Rate	Previous Rate	Comments:
<u>PART.</u>	<u>NIL</u>				

M* - Method of Calculation or source of information for Permit Maximum Allowable Rate -

EF - Emission Factors; AD - Application Data; SP - Similar Permit Data;

EPA - EPA Documents; EST - Estimate; TD - Test Data or other:

() Explain _____

8. METHOD OF AIR POLLUTION CONTROL: ☐ - NONE ☐ - BACT (Standard) ☐ - BACT (transferred)
☐ - PROCESS CONTROL ☒ - ABATEMENT EQUIPMENT: AFTERBURNER ON EACH FURNACE
9. ENGR. COMMENTS/TECHNICAL REVIEW/RECOMMENDATION: ☐ ISSUE ☒ EXEMPTION ☐ DENY
THERE SHOULD BE VIRTUALLY NO EMISSIONS FROM THIS OPERATION
10. PROPOSED SPECIAL PROVISIONS (Other than General Provisions and Maximum Allowables): _____

REQUESTED COMMENTS: (Please return your comments promptly.)

☐ RUSH

SITE OR LOCATION:

☐ SATISFACTORY☐ QUESTIONABLE☐ UNSATISFACTORY☐ SEE SIS DATED _____☐ NO OBJECTIONS.☐ COMMENTS No legal action pending6/25/82 ps

TEXAS AIR CONTROL BOARD
REQUEST FOR COMMENTS

6/81

MAY 24 4 11 PM '82

PERMITS SECTION

DATE 5-21-82 COMPLIANCE DIVISION

☐ CONFIDENTIAL INFORMATION ATTACHED.

TO/FROM: G. MARTHAUR

TO: ☒ REGION: 8 ☒ CITY: ☐ COUNTY:

☐ AR&A; ☒ COMPLIANCE; ☒ LEGAL

PERMIT APPLICATION NO. C-

Applicant indicates copy of application was sent direct to:

PERMIT EXEMPTION NO. X-3611

☐ Region ☐ City ☐ County

1. COMPANY: CONSOLIDATED CASTINGS CORP.
2. FACILITY LOCATION: 2425 CAROLINE, DALLAS
3. LATITUDE: 32° 47' 23" LONGITUDE: 96° 48' 25" COMPANY I.D. NO:
4. PERMIT UNIT NAME: MOLD HEATING FURNACES (3) UNIT I.D.:
5. PREVIOUS RELATED PERMITS/EXEMPTIONS: C-2864 C-3085
6. ☒ - NEW SOURCE ☐ - MODIFICATION ☐ - NSPS ☐ - NESIAPS ☐ - PORTABLE ☐ - PSD
☐ - PERMIT AMENDMENT ☐ - PERMIT REVISION OR CHANGE
 DATE: for ☐ - PROPOSED START OF CONSTRUCTION. ☐ - CONSTRUCTION STARTED.
☒ - FACILITY BUILT AND OPERATING ☐ - AS SOON AS PERMIT IS ISSUED.
7. NAME AND RATE OF AIR CONTAMINANTS: OPER SCHED: 16 H/D; 5 D/W; 51 W/Y; CONTINUOUS

Air Contaminant	Permit Max. Allow. Rate	M*	Actual Rate	Previous Rate	Comments:
PART.	NIL				

M* - Method of Calculation or source of information for Permit Maximum Allowable Rate -

EF - Emission Factors; AD - Application Data; SP - Similar Permit Data;

EPA - EPA Documents; EST - Estimate; TD - Test Data or other:

() Explain

8. METHOD OF AIR POLLUTION CONTROL: ☐ - NONE ☐ - BACT (Standard) ☐ - BACT (transferred)
☐ - PROCESS CONTROL ☒ - ABATEMENT EQUIPMENT: AFTERBURNER ON EACH FURNACE
9. ENGR. COMMENTS/TECHNICAL REVIEW/RECOMMENDATION: ☐ ISSUE ☒ EXEMPTION ☐ DENY
THERE SHOULD BE VIRTUALLY NO EMISSIONS FROM THIS OPERATION
10. PROPOSED SPECIAL PROVISIONS (Other than General Provisions and Maximum Allowables):

REQUESTED COMMENTS: (Please return your comments promptly.)

☐ RUSH

SITE OR LOCATION:

☐ SATISFACTORY

☐ QUESTIONABLE

☐ UNSATISFACTORY

☐ SEE SIS DATED

☒ NO OBJECTIONS.

☐ COMMENTS

C. Rubick

5-26-82

RECORD OF TELEPHONE CALL

Date 5-21-82

Time 2:00 PM

Person making call Gary M. Arthur Tel. _____

Organization TACB MS 578 Location _____

Person receiving call Joe Duman Tel. _____

Organization Consolidated Castings Location _____

Subject Consolidated Castings X-3611

Summary: I called to clarify some inconsistencies in the exemption application. Source #6 is listed twice on Table 1 - both as an existing source and a new source. Mr. Duman explained that the company has changed their furnace numbering system internally and the Table 1 is in error. Two of the existing furnaces shown on the building floor plan as #4 & #5 are still used. The new furnaces are #6, #7 & #8. These are the only furnaces in use. The 3 new furnaces are used only for heating ceramic molds prior to casting. Each furnace has an afterburner.

PM Copies to: REGION 8
WET